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December 29, 2008

President  
Vertellus Specialties, Inc.  
300 North Meridian Street, Suite 1500  
Indianapolis, Indiana 46204-1763  
Attn: John Jones, Director, Regulatory Management

Regional Administrator  
USEPA Region 5  
Mail Code SR-6J  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3507  
Attn: Matthew Ohl

Director, Remediation  
Site Remediation Section  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155  
Attn: Nile Fellows

**Subject: United States of America, et al. vs. Reilly Tar & Chemical Corporation, et al.  
File No. Civ. 4-80-469  
QAPP Submittal in Support of Sections 3.3, Sampling Plans, Consent Decree –  
Remedial Action Plan (CD-RAP)**

Dear Gentlemen,

The City of St. Louis Park (the City) received two letters from the United States Environmental Protection Agency and the Minnesota Pollution Control Agency (the Agencies), dated October 3, 2008, regarding the 2007 Annual Progress Report and the GAC Treatment System Report. Both letters requested a revised Quality Assurance Project Plan (QAPP). The City's response dated October 23, 2008 stated that the QAPP would be revised to meet the Uniform Federal Policy (UFP).

A revised QAPP for the 2009 sampling year is attached. The QAPP has been re-formatted to meet the UFP. Future QAPP revisions will be submitted annually on June 30 beginning in 2009 (For sampling in 2010) and contain a laboratory analysis method for analyzing the 16 priority pollutant PAH compounds at the part per billion and part per trillion levels. Once approved by the Agencies, these methods will be considered for future analyses. The City will review historical PAH results to evaluate candidate samples for priority pollutant PAH testing.

Any questions regarding this submittal can be directed towards this office.

Yours sincerely,

AECOM Inc.

A handwritten signature in cursive script, reading "William M. Gregg".

William M. Gregg  
Project Leader for the  
City of St. Louis Park

Enclosure

cc: Scott Anderson, City of St. Louis Park  
AECOM Environment